



DAVIS & GILBERT LLP  
ATTORNEYS AT LAW

1675 Broadway                    T: 212.468.4800                    www.dglaw.com  
New York, NY 10019                F: 212.468.4888

Direct Dial: 212.468.4869  
Fax: 212.468.4888  
Email: jepstein@dglaw.com

March 24, 2021

**Via ECF and Email (Torres\_NYSDChambers@nysd.uscourts.gov)**

The Hon. Analisa Torres  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**Neuhauser v. Bolivarian Republic of Venezuela/Case No. 1:20-CV-10342 (AT)**

Dear Judge Torres:

We represent plaintiff Alexander Neuhauser (“Plaintiff”) in the above-referenced action. Pursuant to the Court’s February 9, 2021 Order, we write to provide the following status report:

1. We have attempted to serve the complaint on defendant pursuant to 28 U.S.C. § 1608(a)(1), but we are informed that the office of the Consulate General of Venezuela, located at 7 East 51<sup>st</sup> Street, New York, New York 10022, is closed at this time and cannot accept service.
2. We are now proceeding with service of the complaint on defendant by way of the Hague Convention, pursuant to U.S.C. § 1608(a)(2). Accordingly, Plaintiff respectfully requests an extension of time of forty-five (45) days to effectuate service on defendant.

We are available to address any questions Your Honor may have regarding the above at the Court’s convenience.

Respectfully,

*/s/ Joshua H. Epstein*

Joshua H. Epstein